

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE:

Mohammad Hosseini

CASE NO: 17-31053

Chapter 13

SSN# : XXX-XX-8682 DEBTOR

OBJECTION OF TRUSTEE TO CONFIRMATION OF PLAN;
MOTION TO DISMISS

The undersigned Chapter 13 Trustee hereby objects to confirmation of the proposed plan of the above -referenced debtor, and moves that the court dismiss the case pursuant to 11 USC Section 1307 (c).

In support of his objection, the trustee would show as follows:

The proposed plan does not comply with the requirements of 11 USC Section 1325 (a)(5) for the reason that it does not provide for the payment of the value of the amount of each allowed secured claim.

Wherefore, the trustee requests that the court set a hearing on his Objection and Motion, and that it grant such relief as is appropriate and just.

Dated: November 01, 2017

Warren L. Tadlock
Standing Chapter 13 Trustee
5970 Fairview Road, Suite 650
Charlotte, NC 28210-2100

**** IMPORTANT INFORMATION ON REVERSE SIDE ****

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NOTICE OF OBJECTION OF TRUSTEE TO CONFIRMATION AND MOTION TO DISMISS PLAN

The Chapter 13 trustee has filed papers in the bankruptcy case for the debtor to object to confirmation and to dismiss the case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief requested by the trustee in the objection and motion or if you want the court to consider your views on the objection and motion, you or your attorney must file with the court a written response to the objection and motion by November 22, 2017 at the following address:

CLERK, U.S. BANKRUPTCY COURT
401 W TRADE ST.
CHARLOTTE, NC 28202

If you **mail** your response to the court for filing, you must mail it early enough for the court to **receive** it on or before the deadline stated above.

A hearing will be held on the trustee's objection and motion will be held on **December 12, 2017 at 9:30 am** at the following address:

Charles Jonas Federal Building
Courtroom 1-5
401 West Trade Street
Charlotte, NC 28202-1619

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and motion and may enter an order granting that relief.

Dated: November 01, 2017

Warren L. Tadlock
Standing Chapter 13 Trustee
5970 Fairview Road, Suite 650
Charlotte, NC 28210-2100

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CERTIFICATE OF SERVICE

The parties whose names and addresses are listed below were served by United States first class mail, postage prepaid on November 01, 2017.

L. Pascal
Office of the Chapter 13 Trustee

AMERICAN EXPRESS, C/O BECKET & LEE LLP, PO BOX 3001, MALVERN, PA 19355
AOL SOLUTIONS INC, 1836 CENTER PARK DR, CHARLOTTE, NC 28217
BANK OF AMERICA NA, PO BOX 660933, DALLAS, TX 75266
BANK OF AMERICA, PO BOX 15710, WILMINGTON, DE 19886
BANK OF AMERICA, PO BOX 31785, ATLANTA, GA 30356
BANK OF AMERICA, PO BOX 982238, EL PASO, TX 79998
BARCLAYS BANK, PO BOX 8803, WILMINGTON, DE 19899
BRANCH BANKING AND TRUST COMPANY, BANKRUPTCY SECTION /100-50-01-51, PO BOX 1847, WILSON, NC 27894-1847
CHASE CARD SERVICES, PO BOX 15298, WILMINGTON, DE 19886
CITY COUNTY TAX COLLECTOR, PO BOX 31637, CHARLOTTE, NC 28231
CLERK OF COURT WILSON COUNTY, 115 Nash Street E, Wilson, NC 27893
CREDIT COLLECTION SERVICES, 725 CANTON ST, NORWOOD, MA 02062
DAVID R BADGER, PA, 2108 SOUTH BOULEVARD, SUITE 118 ATHERTON LOFTS, CHARLOTTE, NC 28203
DISCOVER BANK, DISCOVER PRODUCTS INC, PO BOX 3025, NEW ALBANY, OH 43054
EDGEFIELD HOLDINGS LLC, ASHLEY A EDWARDS ESQ, 401 S TRYON STREET SUITE 3000, CHARLOTTE, NC 28202
FIRST DATA GLOBAL, 4620 WOODLAND CORPORATE, TAMPA, FL 33614
FREDERICK W. HOETHKE, SAFFA LAW GROUP PLLC, PROVIDENCE PARK, 10710 SIKES PLACE, STE 180, CHARLOTTE, NC 28277
HABIB TAGHEHCHIAN, 11845 Kevin Henry Place, Charlotte, NC 28277
HELEN BABU, 6067 BLUEBIRD HILL LN, MATTHEWS, NC 28104
IC SYSTEMS INC, PO BOX 64378, ST PAUL, MN 55164
INTERNAL REVENUE SERVICE, PO BOX 7317, INSOLVENCY REMITTANCE, PHILADELPHIA, PA 19101-7317
INTERNAL REVENUE SERVICE, PO BOX 7346, PHILADELPHIA, PA 19101-7346
MECKLENBURG CO SHERIFFS DEPT, CIVIL FILING/PROCESS DEPT, 700 E 4TH STREET, CHARLOTTE, NC 28202
MECKLENBURG COUNTY SUPERIOR COURT, 832 E 4TH STREET SUITE 3600, CHARLOTTE, NC 28202
MIDLAND FUNDING LLC, MIDLAND CREDIT MANAGEMENT INC, PO BOX 2011, WARREN, MI 48090
Mohammad Hosseini, 4000 Waterford Dr., Charlotte, NC 28226
MULTIPOINT INC, 1836 CENTER PARK DR, CHARLOTTE, NC 28217
NC DEPARTMENT OF REVENUE, BANKRUPTCY UNIT, PO BOX 1168, RALEIGH, NC 27602-1168
NOVANT HEALTH, RCS WHITEHALL, PO BOX 30143, CHARLOTTE, NC 28230
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SYNCHRONY BANK, c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541
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VERIZON BY AMERICAN INFOSOURCE LP, PO BOX 248838, OKLAHOMA CITY, OK 73124-8838
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